

# Tidewater Marine

04-344

DOCKET FILE COPY ORIGINAL

08 December 2003

RECEIVED

OCT 29 2004

Federal Communications Commission  
Office of the Secretary

Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W. TW-325  
Washington DC 20554

**Subject:** Docket No. DA 03-3669 – Vin: D1128033

**Reference:** 19 November 2003 Wireless Telecommunications Bureau seeks comment on  
MarITEL, Inc. proposal to serve as automatic identification system (AIS)  
frequency coordinator

To Whom it May Concern:

We respectfully wish to go on record as urging FCC to come to an agreement with the Department of Homeland Security instead of MarITEL; regarding the MarITEL, Inc. proposal to serve as AIS "Frequency Coordinator".

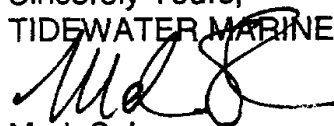
The vision of AIS as an International Convention-based maritime traffic safety system, being administered by a mercenary "coordinator" tends to fly in the face of the goal. The goal being that of inclusion of all possible maritime elements into the system.

Perhaps we simply do not understand the value added to a system that elsewhere in the world has no "frequency coordinators" with a fee that approaches the Coast Guard's estimated hardware costs several years after implementation.

Particularly distressing is the information from MarITEL's website where in Mr. John E. McCarty's biography mentioning his experience as delegate to the IMO. I quote from his biography, "His responsibilities include representing MarITEL on the Vessel Tracking System and Automatic Identification System Committees of the International Association of Aids to Navigation and Lighthouse Authorities (IALA)." Perhaps this does not actually break a trust, but there seems to be more than mere opportunism in the acquisition of radio frequencies later designated as being for international safety purposes.

We earnestly urge FCC to reach an accord with the United States Coast Guard whereby the AIS services can be accessed by the most interests at the lowest possible cost.

Sincerely Yours,  
TIDEWATER MARINE, INC.



Mark Sales  
Regulatory & Sys. Engineer

No. of Copies rec'd 2  
List ABCDE



**Tidewater Marine, L.L.C.**

Pan American Life Center  
601 Poydras Street, Suite 1900  
New Orleans, Louisiana 70130-6040  
Telephone: (504) 568-1010  
A Tidewater Company